

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

-----X		
Yuga Labs, Inc.,	:	Case No. 1:23-cv-00085-MAD-TWD
	:	
Plaintiff,	:	STIPULATION FOR ENTRY OF
	:	CONSENT JUDGMENT AND
v.	:	ORDER FOR PERMANENT
	:	INJUNCTION AGAINST THOMAS
Thomas Lehman,	:	LEHMAN
	:	
Defendant.	:	
-----X		

WHEREAS, on January 20, 2023, Yuga Labs, Inc. (“Yuga Labs”) initiated the action against Thomas Lehman (“Lehman”), captioned *Yuga Labs, Inc. v. Thomas Lehman* (Case No. 1:23-cv-000850-MAD-TWD) in the United States District Court for the Northern District of New York (the “Action”);

WHEREAS, Yuga Labs and Lehman have reached an agreement for resolution of the claims in the Action as against Lehman, the full terms and conditions of which are set forth in the document entitled “Confidential Settlement Agreement” dated as of February 3, 2023 (the “Settlement Agreement”);

WHEREAS, the Settlement Agreement is conditioned upon entry by the Court of a stipulated consent judgment and order for permanent injunction and continuing jurisdiction by the Court on the terms and conditions set forth herein; and

WHEREAS, Lehman has waived formal service of process of the summons and complaint;

THEREFORE, Yuga Labs and Lehman stipulated and agree that this Court has jurisdiction to enter a stipulated consent judgment and order for permanent injunction on the following terms and conditions and that the Court shall have continuing jurisdiction for purposes of enforcing this

consent judgment and order for permanent injunction, the Settlement Agreement, and the request that the Court enter the [Proposed] Stipulated Consent Judgment and Order for Permanent Injunction.

Dated: February 6, 2023

Respectfully submitted,

By: s/ Ethan M. Thomas

Ethan M. Thomas
Ethan M. Thomas NY Reg. No. 5575683
ethomas@fenwick.com
Molly R. Melcher (*pro hac vice forthcoming*)
mmelcher@fenwick.com
Anthony M. Fares (*pro hac vice forthcoming*)
afares@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 415.281.1350

Eric Ball (*pro hac vice pending*)
eball@fenwick.com
Kimberly Culp (*pro hac vice forthcoming*)
kculp@fenwick.com
FENWICK & WEST LLP
801 California Street
Mountain View, CA 94041
Telephone: 650.988.8500
Fax: 650.938.5200

Attorneys for Plaintiff Yuga Labs, Inc.

By: s/ Ethan Jacobs

Ethan Jacobs
Ethan Jacobs NY Reg. No. 4383600
ethan@ejacobsllaw.com
ETHAN JACOBS LAW
CORPORATION
100 Pine St., Suite 1250
San Francisco, CA 94111
Telephone: 415.275.0845

Attorneys for Defendant Thomas Lehman

ATTESTATION OF CONCURRENCE IN FILING

I attest that concurrence in the filing of this document has been obtained from Ethan Jacobs on February 3, 2023.

Dated: February 6, 2023

By: s/ Ethan M. Thomas
Ethan M. Thomas
Ethan M. Thomas NY Reg. No. 5575683
ethomas@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 415.281.1350

Attorneys for Plaintiff Yuga Labs, Inc.